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MEMO ENDORSED

January 22, 2025

VIA ECF

Hon. Valerie E. Caproni
United States District Judge for the Southern District of New York
United States Courthouse
40 Foley Square, Courtroom 443
New York, New York 10007

Re: Greentree Financial Group, Inc. v. Chijet Motor Co., Inc. and Equiniti Trust Co., LLC, Case No. 1:24-cv-006415-VEC

Dear Judge Caproni:

On January 14, 2025, this firm entered a notice of appearance on behalf of Defendant Chijet Motor Company, Inc. Dkt. 25. Both Chijet and Defendant Equiniti Trust Company, LLC have until February 20, 2025 to respond to Plaintiff's Amended Complaint in this action, Dkt. 28, and to the operative pleadings in three related actions.¹

With the consent of Plaintiff Greentree Financial Group, Inc. and Defendant Equiniti Trust Company, LLC, we are writing to request that the Initial Pretrial Conference, currently scheduled for January 31, 2025, Dkt. 22, be adjourned to February 14, 2025 (or thereafter at the Court's convenience), and that the January 23, 2025 deadline for the parties to submit a joint letter and proposed civil case management plan, Dkt. 22, be adjourned to February 7, 2025.

This is Chijet's second request for an adjournment of these dates and the first by this firm. The reason for the requested adjournment is that we have recently been engaged by Chijet, anticipate that we will soon be engaged by Equiniti, and need time to adequately assess the defenses that will be asserted in the Defendants' forthcoming responses to the Amended Complaint and plan for discovery.

Given the early procedural posture of this case and that the parties are coordinating across multiple litigations, it would conserve the parties' and the Court's resources to adjourn the Initial Pretrial Conference until February 14, 2025 (or thereafter at the Court's

¹ Two nearly identical actions are pending in this Court before (i) the Hon. Vernon S. Broderick: *Safety Shot Inc. v. Chijet Motor Co., Inc. and Equiniti Trust Co., LLC*, Case No. 1:24-cv-006420-VSB, and (ii) the Hon. Laura Taylor Swain: *L&H, Inc. v. Chijet Motor Co., Inc. and Equiniti Trust Co., LLC*, Case No. 1:24-cv-006425-LTS. A third action is pending in the New York State Supreme Court: *Kim Chung Wong v. Chijet Motor Co., Inc. and Equiniti Trust Co., LLC*, N.Y. Co. Sup. Ct. Index No. 654555/2024.



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convenience) and the deadline for the parties to submit a joint letter and proposed civil case management plan to February 7, 2025.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Aric H. Wu

Aric H. Wu

cc: All counsel of record via ECF

Application GRANTED. The Initial Pretrial Conference scheduled for Friday, January 31, 2025, at 10:00 A.M. is ADJOURNED to **Friday, February 14, 2025, at 10:00 A.M.** The parties' deadline to submit a joint letter and proposed case management plan in accordance with the Court's prior Order at Dkt. 7 is ADJOURNED from Thursday, January 23, 2025, to **Friday, February 7, 2025.**

SO ORDERED.

A handwritten signature in blue ink, reading "Valerie Caproni", is written over a light blue horizontal line.

1/23/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE